

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MICHIGAN

UNITED STATES OF AMERICA,

Plaintiff,

Case No. 2:17CR20259-001

Hon. Victoria A. Roberts

vs.

JAMES LAWRENCE,

Defendant.

JOHN N. O'BRIEN, II
Assistant United States Attorney
211 W. Fort Street
Suite 2001
Detroit, MI 48226
(313) 226-9715

DAVID R. CRIPPS (P34972)
Attorney for Defendant
431 Gratiot Avenue
Detroit, MI 48226
(313) 963-0210

DEFENDANT'S SENTENCING MEMORANDUM

I. INTRODUCTION

Defendant, JAMES LAWRENCE, by and through his counsel, DAVID R. CRIPPS, submits this memorandum regarding his sentencing. Mr. Lawrence is to be sentenced by this Court pursuant to his guilty plea to one count of Possession with Intent to Distribute in violation of 21 U.S.C. § 841(a)(1), 21 U.S.C. § 841(b)(1)(D) and one count of Possession of Firearm and Ammunition by Convicted Felon under 18 U.S.C. §922(g) and 18 U.S.C. §924(a)(2). The Presentence Investigation Report (PSR) and the Rule 11 Agreement anticipated a guideline range of 130 to 162 months, based on a total offense level of 27 and a criminal history category VI. The Government has recommended that the sentence not exceed the top of the advisory guideline

range. The defense is requesting that this Court depart from the guidelines and sentence Mr. Lawrence to a term lower than the guidelines.

II. ARGUMENT

In *United States v. Booker*, the Supreme Court held that the Federal Sentencing Guidelines are for advisory purposes only; it is merely one of many factors that must be considered when making sentence determinations. *United States v. Booker*, 543 US 220 (2005); 125 S.Ct. 738 (2005). The *Booker* Court explained that when sentencing an individual, a court is not bound by the Federal Sentencing Guidelines. *Id.* Rather, it is bound by 18 USC § 3553(a). *Id.* While the Court must still give some consideration to the appropriate Guidelines range when making a sentence determination, the Court is no longer bound by the applicable Guidelines. *United States v. Webb*, 403 F.3d 373, 381 (6th Cir. 2006). Accordingly, this Court must consider all of the factors set forth in the statute before it can appropriately determine an individualized sentence that is “sufficient but not greater than necessary.” *Booker*, 543 US 220.

The sentencing statute, 18 USC §3553(a), provides in pertinent part,

The court shall impose a sentence sufficient, but not greater than necessary, to comply with the purposes set forth in paragraph (2) of this subsection. The court, in determining the particular sentence to be imposed, shall consider--

- (1) the nature and circumstances of the offense and the history and characteristics of the defendant;
- (2) the need for the sentence imposed--
 - (A) to reflect the seriousness of the offense, to promote respect for the law, and to provide just punishment for the offense;
 - (B) to afford adequate deterrence to criminal conduct;
 - (C) to protect the public from further crimes of the defendant; and
 - (D) to provide the defendant with needed educational or vocational training, medical care, or other correctional treatment in the most effective manner;
- (3) the kinds of sentences available;
- (4) the kinds of sentence and the sentencing range established for . . . the applicable category of offense committed by the applicable category of defendant as set forth in the guidelines . . .
- (5) any pertinent policy statement issued by the Sentencing Commission . . .

- (6) the need to avoid unwarranted sentence disparities among defendants with similar records who have been found guilty of similar conduct; and
- (7) the need to provide restitution to any victims of the offense.

As the Sentencing Guidelines are now merely advisory, the Court may vary from the Guidelines so long as the requirements set forth in 18 USC § 3553(a) are satisfied. While it has been established that a sentence within the appropriate Guidelines range is credited with a rebuttable presumption of reasonableness, it has also been established that a sentence outside of the proposal set forth in the Guidelines range is not presumptively unreasonable. *United States v. Williams*, 436 F.3d 706, 708 (6th Cir. 2006); *United States v. Collington*, 461 F.3d 805, 808 (6th Cir. 2006).

A. 18 USC § 3553(a)(1): THE NATURE AND CIRCUMSTANCES OF THE OFFENSE AND THE HISTORY AND CHARACTERISTICS OF THE DEFENDANT.

Section 3553(a)(1) requires the Court to consider the history and characteristics of Mr. Lawrence as a relevant factor when making sentencing determinations. The policy rationale underlying this subsection is that the Guidelines do not evaluate the defendant's personal characteristics when determining a range. *Rita v. United States*, 551 U.S. 338, 357; 127 S. Ct. 2456, 2461 (2007).

Nature and Circumstances of the Offense

Mr. Lawrence has pled guilty to one count of Possession with Intent to Distribute in violation of 21 U.S.C. § 841(a)(1), 21 U.S.C. § 841(b)(1)(D) and one count of Possession of Firearm and Ammunition by Convicted Felon under 18 U.S.C. §922(g) and 18 U.S.C. §924(a)(2). The offense conduct underlying Mr. Lawrence's conviction in this case consists of his possession of a firearm and ammunition and his possession and distribution of at least 283.6 grams of marijuana.

Personal History and Characteristics of Mr. Lawrence

Mr. Lawrence was born on July 5, 1990. He has lived in Detroit, Michigan for his entire life. His mother, Kelsi Lawrence, also resides in Detroit and is disabled and requires a caregiver. Mr. Lawrence was acting as her caregiver before he was incarcerated. His father, James Burdin, lives in Texas. Mr. Lawrence does not recall his mother and father ever being in a relationship. Mr. Lawrence has three maternal half siblings, and two paternal half siblings.

According to Mr. Lawrence, he had a normal childhood. His mother became addicted to crack cocaine when he was 13 years old and he recalls his father being in and out of jail for almost his whole life. He has lived on and off with his aunt and step-mother. Mr. Lawrence still remains close with his step-mother. Mr. Lawrence claims paternity over four children ranging in ages from 2 months to 6 years. Mr. Lawrence has a relationship with all of his children. Mr. Lawrence is currently in a relationship with Christina Lampkin, who resides with his mother in Detroit.

Attached to this memorandum are several support letters written Mr. Lawrence's behalf by his family and friends.

B. 18 USC § 3553(a)(2): THE NEED FOR THE SENTENCE IMPOSED.

Mr. Lawrence acknowledges the seriousness of his offense. He has pled guilty to one count of Possession with Intent to Distribute in violation of 21 U.S.C. § 841(a)(1), 21 U.S.C. § 841(b)(1)(D) and one count of Possession of Firearm and Ammunition by Convicted Felon under 18 U.S.C. §922(g) and 18 U.S.C. §924(a)(2). Mr. Lawrence takes full responsibility for his actions that led to this case.

C. 18 USC § 3553(a)(3): THE KINDS OF SENTENCES AVAILABLE.

While the anticipated guidelines range 130 to 162 months, based on a total offense level of 27 and a criminal history category VI, Mr. Lawrence is not eligible for probation.

III. CONCLUSION

Mr. Lawrence understands the wrongfulness of his actions. Accordingly, he appreciates the need for a sentence that reflects the seriousness of his offense, promotes respect for the law, and provides just punishment for his conduct. 18 U.S.C. § 3553(a)(2). He asks that this Court consider the factors presented above as sufficient to support a sentence below the guidelines.

WHEREFORE, the Defendant, JAMES LAWRENCE, requests this Honorable Court sentence him to a term lower than the recommended the range.

Respectfully Submitted,

Dated: April 13, 2018

/s/ David R. Cripps
DAVID R. CRIPPS (P34972)
Attorney for Defendant
431 Gratiot Avenue
Detroit, MI 48226
(313) 963-0210

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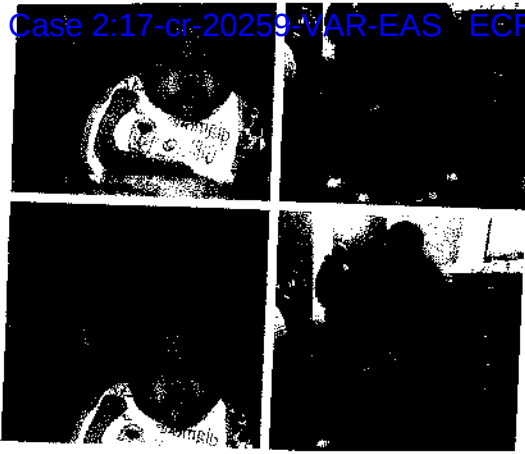
CERTIFICATE OF ELECTRONIC FILING WITH COURT

Attorney, DAVID R. CRIPPS, affirms, deposes and states that on April 13, 2018, he did cause to be served electronically with the Clerk of the United States District Court, Eastern District, using ECF system which will send notification of Defendant's Sentencing Memorandum filing to the following:

1. Hon. Victoria A. Roberts
2. John O'Brien, II

Dated: April 13, 2018

/s/ David R. Cripps
DAVID R. CRIPPS (P34972)
Attorney for Defendant
431 Gratiot Avenue
Detroit, MI 48226
(313) 963-0210



James is a tremendous father and
friend he is not a monster or
criminal. His kids need him.



Alana McGruder
*AlanaMcgruder

being away. Please

this feeling of him

never ~~before~~ felt

his 1st born and have

from my dad. I am

never been what

old and have

I am 5 years

Lawrence.

He is home is smart

W

my dog is gone.

Please give him

gone. I need my dog

my best friend is

made me sad lonely

him being away has

we are a family.

let him come home

I hope that by time this letter reaches you all is well on continues to be well. during the time I have been incarcerated has proven to be a period of growth on a big transformation in my life. the experience that has provided me with time to focus on the direction of my life. Due to some of my past decisions, I was headed in the opposite direction I would of like my life to be headed. Your Honor as you may or may not know, I am a music enthusiast with a massive following an influence on my audience that ranges from children to young adults. before now I never considered the influence an impact I could have on my followers. Then the past years I have been involved in numerous acts of charitable contributions to the community. for an example myself along with other music entertainers, once lived on business once a month we give mass donations of food and clothing to the homeless on less fortunate. We also sponsored back to school give aways with a (100) over books and supplies to the youth.

Honorable Judge Roberts,

James Lawrence # 262198

11-6-17

17-20259

During my time I've been incarcerated I decided how I could use my musical influence in a more positive an responsible fashion. I also started an Co-founded a non-profit organization, That has a message targeted to the youth to stop gun violence along with performing free of charge at schools on pep-rallies. I have already had my friends on family start our media Platforms to promote our message, as well as where supporters can donate to our cause rather than clothes, food, money, or supplies. Our honor If Im granted bond I will immediately work toward my goal. I would like to leave a lasting impression on my audience before I serve my debt to society. The most Important role I play in my life is being a father to my children, I have 2 boys and a girl with another boy due december of this year. I would like to have as much time with them as possible before I have to spend such a long period of time away from them. During the time I've been incarcerated It's been hard to see my kids due to the out of date video visitation on the no-mail or the rule they have at the facility Im housed at. I've been at Livingston County Jail for 7 months,

with no access to a law library or 24 hour lockdown
every other day, which makes it harder for me to
fight my case or help my lawyer with my motions as well.
Your honor, I am not your mercy or humbly ask
that you allow me to be present during the birth of
my child or to spend as much time with my
family before my imprisonment. I am also the
sole care provider of my mother who struggles
with diabetes. I understand there are consequences
for the poor decisions I've made and I am prepared
to serve my debt for my actions, last but not least
I would like to offer my apologies to my family,
children, and most important the courts. I am
asking for your mercy your honor an ask that
you take giving me a bond into consideration.

I hope that by time this letter reaches you all is well on continues to be well. during the time I have been incarcerated has proven to be a period of growth on a big transformation in my life. the experience that has provided me with time to focus on the direction of my life. Due to some of my past decisions, I was headed in the opposite direction I would of like my life to be headed. Your honor as you may or may not know, I am a music enthusiast with a massive following on my audience that ranges from children to young adults. before now I never considered the influence an impact I could have on my followers. Over the past years I have been involved in numerous acts of charitable contributions to the community. for an example myself along with other music caterers, one thing, an audience once a month we give mass donations of food and clothing to the homeless on less fortunate. We also sponsored back to school give aways with a (100) sweat suits on supplies to the youth.

Honorable Judge Roberts,

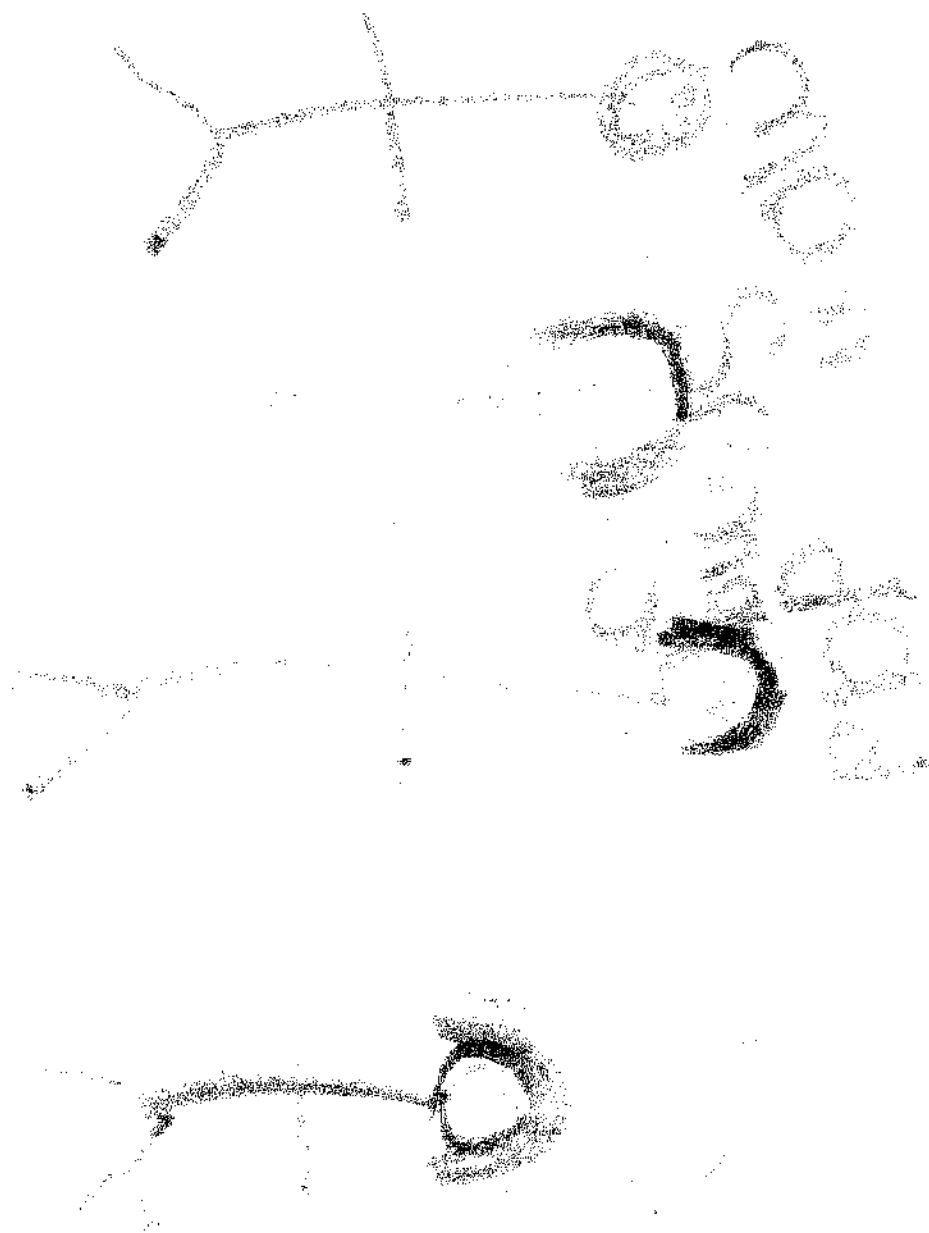
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During my time I've been incarcerated I decided how I could use my musical influence in a more positive or responsible fashion. I also started an co-founded a non-profit organization, that has a message targeted to the youth to stop gun violence along with other entertainers I plan to promote my stop the gun violence message along with performing live of charge at schools and pep-rallies. I have already had my friends on family start our media platforms to promote our message, as well as where supporters can donate to our cause rather than clothes, food, money, or supplies. Our honor If I'm granted bond I will immediately work toward my goal. I would like to leave a lasting impression on my audience before I serve my debt to society. The most important role I play in my life is being a father to my children, I have 2 boys and a girl with another boy due december of this year. I would like to have as much time with them as possible before I have to spend such a long time of time away from them. During the time I've been incarcerated it's been hard to see my kids due to the out of date video visitation on the no-mail or his rule they have at the facility I'm housed at. I've been at Livingston County Jail for 7 months,

with no access to a law library or 24 hour lockdown every other day, which makes it harder for me to fight my case or help my lawyer with my needs as well. Your honor I am not asking for anything or humbly ask that you allow me to be present during the birth of my child or to spend as much time with my family before my imprisonment. I am also the sole care provider of my mother who struggles with diabetes. I understand there are consequences for the poor decisions I've made and I'm prepared to serve my debt for my actions. Last but not least, I would like to offer my apologies to my family, children, and most importantly the courts. I'm asking for your empathy your honor and ask that you take giving me a bond into consideration.



To whom it may concern,

My name is Taja Lawrence, I am the owner and founder of Heaven Sent Cupcakes, LLC, A small local business in the city of Detroit. Heaven Sent Cupcakes was founded in the year of 2014, right before I graduated with a 3.5 GPA from The Art Institute of MI with my diploma of arts- baking and pastry. Heaven Sent Cupcakes serves delicious cupcakes, cakes, cookies and chocolate covered desserts. Heaven Sent Cupcakes has and still does sponsor multiple, non-profit organizations in the city of Detroit such as, "The Doors of Success Foundation", "Young Minds In Transition School Tour", and "Unique Sisters", just to name a few. I am also a poet, self-published author (of a book by the name of "Diary of A Broken Hearted Girl", a poetry book that features my own personal poems from life experiences) and an inspiring motivational speaker.

James Kyle Lawrence is my oldest brother, from my mother. We grew up in the city, along with our oldest sister, Iesha Lawrence, and middle brother, Trey Lawrence. At a very young age we had to learn how to survive with our mother being absent in our lives. James has always been my father figure. He took care of me growing up and never resigned from that role as we got older. My brother was and still is my biggest supporter, as I am his. He helped me grow my business and taught me important life essentials. He is not this inhumane person the media makes him out to be. He has always lended a helping hand to those in need, regardless if he knew them personally or not. He taught me to never be selfish and to always give, to remain humble and put others before myself. James is my provider, my support, my backbone. I need him home, his children need him home, and the rest of his family needs him home.

A handwritten signature in black ink, appearing to read "Taja Lawrence". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

To all the Officials of the court; regarding the matter of James Lawrence

I am miss Kelsi M. Lawrence the mother of the defendant James K. Lawrence

James is my eldest son of four children. James poses as the man of the family, as well as head of household. Taking charge of most family matters as a father would, for instance insuring all of his children, nieces, nephews, god children, and siblings have the necessities needed for everyday life including lots of love and nurturing.

Growing up as a child James was very shy and reserved, unfortunately when James became an adolescent I became a drug addict leaving him and his siblings to live a hard knock life. This is when he began to take the role of providing for his family and has not wavered since. His heart is heavy; he carries a lot on his shoulders. After five long years of battling my demons of drug addiction I became clean. Now I have several disabilities including but not limited to mental health issues. James insures that I'm well cared for, from laying out my clothes, keeping me on my meds schedule, to taking me back and forth to my doctor's appointments, just to say the least. He definitely has kept my best interest at heart. My son keeps me smiling, always with a good laugh (he's such a jokester). I'm so very heartbroken, I haven't been right since my son James has been behind bars. Before James became an aspiring rap artist he was held at gunpoint in our family home with his siblings, nieces, and nephews present by someone whom he thought to be a friend. James was robbed of money for a car part. That incident shook James to the core, just the thought of his whole family and himself could've been gone senselessly in a blink of an eye. He then became paranoid and installed cameras, an alarm system, and armed himself to feel a since of security and protection for himself and his family. James not only takes care of his family, you would often find him providing a hot shower, clean clothes, shoes, cat, a warm meal and a place to sleep for those in need. James is a rap performer so almost all of his social media activity is for promotional recognition, he is an entertainer. Everyone that James comes in contact with adores him. James is a very sweet individual and has a lot of love and support. So with that being said, I pray the courts take all these things in consideration upon his sentencing.

Miss Kelsi M. Lawrence
(313) 690-1304

Dear Judge Roberson,

My name is Christina Lampkin and I am the girlfriend of Mr. Lawrence. I asks that you show leniency towards James sentencing.

First time I met James he has always displayed nothing but love to everyone around him. He is a family oriented man. Most of all honest, devoting, caring and a happy person.

He helps any and every one in need as much as he can. Especially those close to him. I've never seen anything other than love and compassion from him.

During the time that I have been with James I have seen what a wonderful father he is to his 3 children that ranges from ages 1 to 5. Weeks after Mr. Lawrence lock up I later found out that I was pregnant with a boy. This is my first child and I have been praying that some type of remorse is showing when making your decision, so that we can raise our son together and he could be here for his other children.

Knowing that I was stuck in between two hard rocks and not having my go to person here with me is what made me think that this is something I cannot do alone. But god made my decision and I'm also allowing god to make a decision for the lowest charges or bond for my boyfriend.

James will always say, "Baby, I'm not how I use to be". But I didn't really take them words into consideration until the day I sat in that court room and they read his child hood charges.

Being with Mr. Lawrence, I can say he isn't that same person. I have never pictured him as a bad guy. He is a good guy in everyone's eyes. Him participating in community events for Detroit and so on. Since we been together has been nothing but a motivator, helping hand, and loving man.

I pray every day that you Judge Roberson, would take my letter along with all the others from family and friends into consideration and allow James to come home to all that love him.

Thank you

A handwritten signature in cursive script, appearing to read "Christina Lampkin".

Dear Judge,

My name is Iesha Lawrence, James Lawrence's sister and I am the oldest of our four siblings therefore they look up^{to} us.

He is a great leader, provider, entertainer, and family oriented man. He has touched so many hearts and has helped so many people in need. He has always been an inspiration to our generation and the next to be brought up.

My brother is my best friend and I am very protective of him, he is the only person I can tell my secrets and problems to. His children and family misses him a great deal and all of our lives has been different without his presence. He is my mother's sole care provider due to all of her disabilities.

He is not the man that the media is trying to make him out to be, granted he has made some bad decisions in his past, but he has blossomed into a hard, loving, young entrepreneur that gives back to the community.

In conclusion I ask the courts to take all of this into consideration upon his sentencing and I thank you for taking this time out to read these letters.



To whom it may concern:

My name is Mario brown; I am a good friend of James Lawrence.

I know this situation looks bad, but that's the good thing about life and responsibilities. We all tend to make mistakes in life in which we hope to learn from.

I hope my good friend learns from this situation, he's not a bad individual or a hardened criminal. He's a very talented man with a heart of gold, a loving father who's always been there for his children and is very involved in their lives.

I've witnessed him give strangers the clothes off his back as well as take time out of a day to feed the homeless and less fortunate on several occasions.

I just hope my good friend can come home soon and continue to be the good hearted person that he has always been.

Thank you for taking the time out to read this letter.

To Whom It May Concern:

My name is James Lopaze Burdin, my son is James Lawrence who is an upcoming rapper that made a few mistakes in his life. He is a father of 4 children and has made some mistakes in his life time. James Lawrence really don't have much of a juvenile record. The system is trying to make James out to be. My son failed to show ID in Houston and was in jail for about a week and released that is the only reason he was in trouble when he came to Houston. My son is a young man who gives back to his community. My son and his friend feed the homeless people in the city of Detroit, Michigan which it is a video showing them serving this duty. I am a concerned father like any other parent and I pray that the court will take another look at my son and realize he is not a bad person. James has a strong support system that is here to help him when he is released. He also has a job opportunities waiting for him once he's released. I'm asking that the court will take consideration of everything and give my son James Lawrence another chance.

Sincerely,

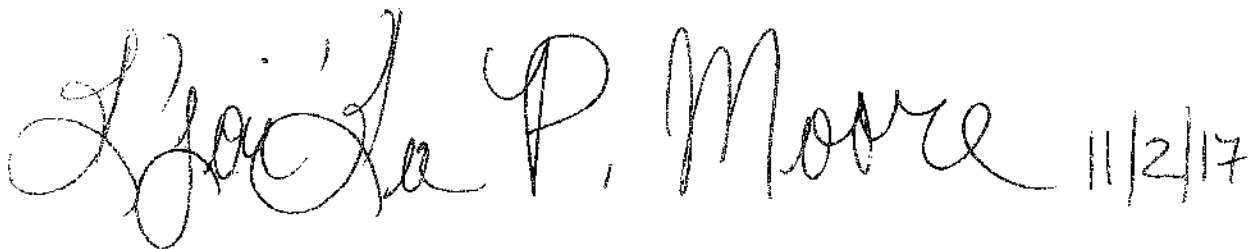
James L. Burdin

To Whom It May Concern,

My name is L'Jai'La Moore also known as J-Low. I am writing this letter on behalf of James Lawrence, who has been a great friend and like a brother to me for over 7 years. I met James back in 2010 at Oakland Community College at an open mic show. I am rap artist just like him and I was introduced to him after I performed. Because of our passion for music and money we became close, great friends. James is not only a great friend, but a great father. He always takes care of business when it comes to his kids. James is also respectful, funny, outgoing, loving and family oriented. He is known on Facebook and Instagram for creating funny posts and parody videos, which gets him a lot of views and likes. James has given back to the community by creating fundraisers in his name to help people in need. He is a good, kind-hearted person, who would help any of his friends or family in need of: money, a place to stay or an ear to listen. In closing, James has an important impact on my life, as well as others. I'm asking in regards to his case, if you could please consider showing and giving some type of leniency. James is not a bad person and he has a strong support system full of friends and family, who love and care about him; including myself. Thank you for your time and consideration.

Best Regards,

L'Jai'La P. Moore

A handwritten signature in black ink that reads "L'Jai'La P. Moore". To the right of the signature, the date "11/2/17" is handwritten.

Sincerely yours, Teri Evans.

Thank you for your time!

What I admire most about James is his Drive, willingness, and the Love he has for his children. In a world filled with so many decadent fathers James makes sure his kids are priority. When I first heard that he was being taken away the first thing that came to mind was his kids. Then of course how sad I was to see him go. He has never had a bad attitude with me and always handled things accordingly! James may have gotten in trouble but I don't feel this is who he is as a person. His surroundings and upbringing I feel may have caused him to feel the need to be protected and alert at all times. The James I know is a provider, sweetheart, creative, and fun person. He can and will be the life of the party and make sure everyone has a great time. I pray for him often, and I know he will find his way. I wouldn't wish this on anyone but I hope and pray that with this time he has done, that God will give him a new outlook and path to follow from this day forward in life. To be a better him for himself, his kids, his family, and the world as an example. I do feel that each and every day that goes by a good man is away from his family, children, and loved ones! There's a lot of bad people and evil out here but I would not place James in that category we need him to come home. As soon as possible would be best, to let him come early would not be a regretful decision.

This letter is in regards to James Lawrence! My Name is Teri Evans of Cake Making Divas, Online Bakery! I'm writing because I personally have known James for over 3 years now! When we first met he came to me as customer who had a very specific request for his cake. He wanted so much detail on the cake I was just wondering was he serious! When a person is that detailed I think it says a lot about them and how they are as a person. I was excited because he knew I could do what he requested and put that faith in me. Once his order was completed he was so happy that he posted the picture all over social media for people to enjoy and question who in the world made it. Of course he sent them all to me directly, every since then he has been a return customer of mines with more and more extreme cake designs every time he decides to order one. I noticed he was a very eager person who was a little rough on the outside but had a heart of Gold. We became good friends. I found myself from time to time yelling at him and pushing him to go in different directions in life that would better him. He said I'm like a mother to him, so from then on I look at him as my adult son who I have to make sure stays on track.

To whom it may concern,

November 1, 2017

To whom ever it may concern;

My name is Lavance Golden, James Lawrence is a friend of mine, he's always been helpful, and caring. every since I've met James all he wanted to do is pursue his rap career and take care of his children and family. I've personally witnessed James and his friends feeding the homeless and giving away book bags and back to school supplies. James has goals and for sure is trying to make it. James has plenty of family and friends that supports him in his goals. I don't think I can name one person who dislikes James. James and his team throws fundraisers for coats for kids, he always finds ways to give back and support the community. I'm pretty sure if James had another chance he would do right, because of the love he's shown towards everyone. The time he's been away has already been hurtful to his loved ones and friends. I have never known James to be a monster, out of 10 plus years I've known him. Respectfully please take notice of these things when being sentenced.

Jennifer Shaw of Sterling Heights, Michigan

I am a business and real estate student, previous foreign language teacher, office manager, and store manager. I have known James Lawrence and his family for over ten years. My personal experiences with James have always been pleasant and memorable. He has spent a lot of time with my husband and me while we lived in Oakland County several years ago. He's always been respectful, well-mannered, kind hearted, funny, and a helpful young man. I know as a juvenile he went through many hardships. But has always been a good kid and very pleasant to be around. I have seen him grow into the fine young man he is today. I am deeply hurt to see him and his family in such distress due to his current position. James has three small children and one on the way. He has been a great father and provider. He also has nephews that look up to him he really has a close nit family that loves and supports him. He's been a great role model. I sincerely ask the courts to consider all these things when deciding James's Lawrence's sentencing. There are many people, including myself that are willing to help James in cooperation with any guidelines the court may oppose on him.

Thank you for your time and consideration.

Sincerely, Jennifer Shaw

To whom it may concern, my name is Jermaine Jefferson. I am here today writing on behalf of my cousin James. I can tell you how he has grown in to a genuine caring man that's very family oriented. James is the type of person to try and help everyone out no matter the situation as long as I have known James. He has been a leader trying to make a way out of no way and make the situation better no matter the mistake. I have seen him make it in life I seen him take charge and responsibility as a man for anything he had done and try to learn and grow from each situation so I can say this is someone I can learn from and grow with and that I want in my corner. He motivates me and the people around him to strive and be successful in life.

To whom it may concern,

On behalf of James Lawrence, this letter is from a close relative and friend. James is a very loving, supportive, and giving person.

It has been times when James was not capable of giving and would still give his last. James had participated in community service events such as; giving back to the community and feeding homeless people of Detroit.

Also taking in relatives that had no place to go. James is a great parent to his children as they need him home for support and guidance. James also has a great music career that is perusing and becoming very successful. James presence is missed and is much needed.

His encouraging words and actions have helped and guided a lot of people. We understand that James actions have led to his incarceration however we ask you for an optimistic heart when making your decision.

Giving James another chance at being a father, man, and leader will not be regretted decision.

Thank you, David King

Hello,

This letter is coming from a person that has been in James life for 13 years. I Lateasha Lake have blessed him with his two oldest sons, Semaj Lawrence and Braylen Lawrence ages 5 and 2.

The things that have went on in the past 7 months have been hurtful to the family. I have not been able to answer my boy's questions on where their father is.

Yes, I understand that it is a consequence from things that are against the law. But those actions were taken among his past and ruff life that he has lived. Without him being here it has been a struggle on a lot of things.

Deep down James isn't the person the system is making him out to be. He has changed his way and became a changed man for his children. He's a loving, talented, go getter and out spoken person. He has come a long way from the ages of 15 years old.

The skills that god has blessed him with are skills that I want my boys to learn from. We have always been a family no matter what. There is never a moment he has missed with his boys. If there's a football game, or school event he's there. So to just take him away from his family and friends mainly his children is devastating. Birthdays and Christmas without him will not be the same.

Everyday I hear from my oldest son, "Mom I miss my dad" and it hurts my heart because he doesn't understand and have never been away from him for so long. I know deep down just for his kids that James is willing to make changes, and I will make sure of those changes just to be in his kids life again.

To whom this may concern,

My name is Ashley, I am a longtime friend of Mr. Lawrence for approximately 11 years.

I have watched James grow into a man from a teen. As any human being mistakes were made along the way and lessons had been taught. However as James had gotten older he has done various contributions to make up for the troubles of his teenage lifestyle. Examples are feeding the homeless, participating in coats for kids, also backpacks for kids amongst other charitable events.

He is a wonderful father of 4 and was working hard to give his children the life he had dreamed as a young man. Is James perfect? No however he makes sure his children and nephews and nieces did not have to want for anything, therefore paving the way for them not to have to take the route he chose as an adolescent.

He is the key to his family for his mother, sisters and brother. He displays leadership and love to his children. I understand as an honorable judge you have to follow certain guidelines, however I ask that you take the good James have portrayed into consideration. He has never been in Prison, although it's understood he may have a record as a juvenile, but as an adult he was making progress to be a better man and father.

Thank you for taking the time to read this.

Sincerely,
Ashley Zimecki

11/2/17

To Whom It May Concern;

Hello, my name is Tara Tatnall and I am writing a character reference letter for James Kyle Lawrence. James is a close friend of mine. I have known him for about fourteen years. It really hurts me to see James in jail and facing prison time because I love him and I care about his well being. When I got the news he was in jail I broke down in tears because that's the last place I want to see my friend. I also know it hurts his family too from his parents, his sisters, his brothers, and his children!

I know he is in quite a bit of trouble. I have talked with about his case and he is trying to stay focus on his future and when he comes home to better his life. No matter the case, I'm always there for James. If he needs someone to talk to, if he needs something financially I'll do as much as I possibly can because that's what friends are for. Even if its just for moral support, I'm here. All I want is to see James come home to his family and to succeed in life!

Like I said I have known James for fourteen years and through all the years James has proven to be a strong, independent, caring man. He has been through so much in his life and no matter what he always see's the glass half full instead of half empty. He can see the positive in any negative situation that he is going through and maybe that's why he is so strong. Anyone who knows James would tell you he has a very big heart and he cares about the people around him. He will help anybody because that's the type of person he is. If any of his friends needed help with anything, James was there to help them with whatever struggle they were facing. James also has handed out brand new shoes, clothes, and bought food for people in need. He tries to give back to his community as much as he can and he enjoys it. James is also a great son, father, and friend. He is amazing with his children and they love their daddy. He will do absolutely anything to make sure his children have a smile on their face. Now a days, you don't get too many fathers that actually act like a father or even want to be around. James is the opposite. His children are his world! He holds them dear to his heart. Family is a big thing with James. His mother is his rock. It hurts him being away from her and its hurting his mother very bad with him being gone. Not to mention his siblings. James has been one of the key male figures in his younger sister's life and she is taking it hard since he has been gone.

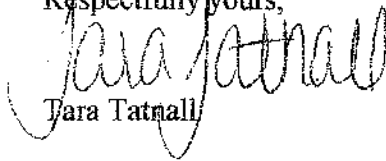
From my personal experience, from the time we were young, James has been there for me. We started off as friends, we dated, and then ended up being just friends. He has been the person I can talk to about anything. I don't have to worry about him judging me. If I'm having problems in my own life he points me in the right direction and encourages me to keep pushing forward. If you're having a bad day James will make sure he makes you laugh by doing something silly. After all these years we are still friends and seeing him in jail and possibly prison is heart breaking. I don't have my friend that's one call away any more. I love and care about James and I just want to see him succeed in life. I want him to be the best he can be because I believe in him and I know he can go far!

11/2/17

James going to jail has impacted a lot of people from his family to his friends. He is the glue that holds everyone together. His children miss their daddy. His parents, siblings, and friends miss him also. Everyone is taking it hard, especially not knowing how long he will be away for. No child wants to grow up with out their father and no father wants to not be there for their child when the child needs them. I believe too long of a time being away is going to hurt, not only his family, but his children by not having him around. Fathers play a key part in a child's life, from teaching his boys how to be a man and treat little girls right and teaching his daughter how a man is supposed to treat a woman and what type of love to accept. James is truly a great person when you get to know him. Please give him another chance to prove he is the great person I know he is, to you and the courts.

Thank you for taking the time and allowing me to tell you a little about my friend. And also for allowing me to express my thoughts and feelings in regard to James and this case.

Respectfully yours,

A handwritten signature in cursive script that reads "Tara Tatnall". The signature is written in black ink and is positioned below the typed name.

Tara Tatnall

November 2, 2017

Character letter for

James Lawrence

Hello my name is Deangelo Scott. I am writing to provide a character reference for my brother James Lawrence. I am aware of the charges that have been placed against James Lawrence. His mother and my mother have been the best of friends since they were little girls. I have known James since we were both babies. We grew up in the same house, went to the same schools, played sports together. We even talked about our future dreams together. So as you can see I consider James Lawrence as my blood brother although we are god brothers. The crimes that James is being of accused of do not fit his character. I say this because my brother has a caring nature and he would give the shirt of his back if needed. He will help anyone out with no problem. He is a humble man, and a great father to his children. He enjoys life and tries to steer away from trouble. I feel he was caught up in a no win situation. The things that have been told by the media about my brother James are all so unrealistic. James is the heart, soul and backbone of the family. His absence in our family has hit each one of use very hard. And life has not been the same. I ask that you show mercy on my brother James. He will miss very special moments of his children lives, he will miss my wedding, as he was supposed to be my best man. He will miss new births to the family as well. He's definitely not a danger to society. I asked that all these things be taken into consideration upon his sentencing.

To Whom It May Concern;

My name is Jayna Fullove and I am pleased to write this letter on behalf of James Lawrence, as he is my brother. James Lawrence is an outstanding brother that has a great relationship with his family, children, and even the community. James has always been a loving person, he's the type of person that would give his last to someone if in need. James is a person that loves helping people and giving back to his community. On Multiple occasions James has fed the homeless out of the kindness out of his heart. James knows the struggles of being homeless and not being able to eat and have a place to stay. James had it rough throughout his early teen years that turned him into being a loving, kindhearted person that is willing to give out a helping hand at any time.

James has always been a person to lean on when in need of a shoulder or when you need a little motivation to keep you pushing. I can honestly say if it wasn't for my brother James Lawrence motivating me and telling me to finish out school and get my degree, I'm not sure where I would be right now. James was one of the people that kept me going and was extremely proud of me for staying on track. James was so proud when I told him that I will be graduating December 2017 and he said he will be right there when it is time for me to walk across that stage. Unfortunately due to his present circumstances James will not be able to attend my commencement and see me walk across the stage. That breaks my heart deeply but I know my brother is going to be extremely proud of me when I tell him I finally got my degree.

James is an outstanding father to his children, in which his children are in need of him. James's children range from newborn babies, toddlers, to eldest whom will be 6 yrs of age November 25th He is also expecting to have a child this upcoming December. As an Aunt of his children, I see the hurt and pain that these children are going through as they're missing their father. His children are at a young age and them growing up without their father in life could have a deeply mental impact on them. His children are in need of their father. If you could take James's parenthood, with the rest of the kindhearted things I stated about James into consideration as he is being sentenced that would be greatly appreciated.

Thank You,

Jayna Fullove

To Whom it May Concern:

I am writing on behalf of James Lawrence. I have known James Lawrence since as long as I can remember. James is a family member of mine, therefore I believe I am in a position to speak to James's moral character. so I hope you will take this letter into account when making your decision.

James in short is a good person. He has always been kind and generous with others. He has a strong sense of duty which applies in his family as well as in the community. James is a great father to his children and is very involved in their lives. James has a great deal of integrity, and always tries to make sure that he is doing the right thing.

It must be difficult to make a decision like this when you don't actually know the person standing in front of you, so I hope you will look at my letter and the countless others you are receiving, and understand that James is the kind of person that people rally. That has to say something, so please let that be a factor in your decision.

Thank You Your Honor,
Taliaia

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Thank You Your Honor,
Taliaia

Kelly King

P.O Box 87073

Canton, MI, 48187

November 1, 2017

RE: Letter of reference character

To who it may concern:

My name is Kelly King, a relative of the defendant James Kyle Lawrence. The purpose of this letter is to describe Mr. Lawrence character. I've know the defendant his entire life. Mr. Lawrence is a family oriented person, who has always provided for his children/ family. Mr. Lawrence have gone beyond the call of duty for myself and others, in their time of need. Mr. Lawrence has shown good quality as being a mentor to others. Mr. Lawrence is an intelligent, capable, dedicated, and personable young man. He is always quick on his feet, with sensible reactions in all the circumstances I've seen him in. I feel confident in saying that he is capable of handling any situation with thoughtfulness and maturity. Please don't hesitate to contact me (313-999-5035) with any other questions.

Regards,

Kelly King

A handwritten signature in cursive script, appearing to read "Kelly M. King", written over the printed name "Kelly King".